

RE: [EXTERNAL] Gray proposed 2nd Amended Pleading

Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>

Wed 10/19/2022 3:25 PM

To: Wylie Stecklow <wylie@wylielaw.com>; Siddiqi, Omar (Law) <osiddiqi@law.nyc.gov>; mickeyo@lawyer.com <mickeyo@lawyer.com>; Balin, Robert <robertbalin@dwt.com>; Riordan, Shannon (LAW) <sriordan@law.nyc.gov>
Cc: NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>

Wylie,

With the below correction, we have no further objections to Gray plaintiffs' second amended complaint. Please be sure to include our whole team on all future communication.

Sincerely,

Nadine Ibrahim
Senior Counsel
(212) 356-5037
nibrahim@law.nyc.gov

From: Wylie Stecklow <wylie@wylielaw.com>

Sent: Wednesday, October 19, 2022 10:08 AM

To: Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>; Siddiqi, Omar (Law) <osiddiqi@law.nyc.gov>; mickeyo@lawyer.com; Balin, Robert <robertbalin@dwt.com>; Riordan, Shannon (LAW) <sriordan@law.nyc.gov>

Subject: Re: [EXTERNAL] Gray proposed 2nd Amended Pleading

Good morning,

I am circling back on this. Please let me know if we are good to go.

Thank you,

Wylie

Wylie Stecklow PLLC

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Southern District New York Chapter President (2018-19)

National Civil Rights Chair (2016-18)

Fordham Law School Adjunct Professor (2018-present)

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Top Rated Civil Rights Attorney

[Qualified Immunity: Is the End Near, NYSBA Journal Article by Wylie Stecklow](#)

From: Wylie Stecklow <wylie@wylielaw.com>

Sent: Thursday, October 13, 2022 4:42 PM

To: Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>; Siddiqi, Omar (Law) <osiddiqi@law.nyc.gov>; mickeyo@lawyer.com <mickeyo@lawyer.com>; Balin, Robert <robertbalin@dw.com>; Riordan, Shannon (LAW) <sriordan@law.nyc.gov>

Subject: Re: [EXTERNAL] Gray proposed 2nd Amended Pleading

Hi Nadine

Thank you for the email and the explanation about Altieri. We do have an unidentified white shirt officer that we believed was Altieri but accept your representation that the records show Altieri was not on duty and no present during Adam Gray's arrest. The mistaken identity was made based on a helmet number. So while we are in agreement to remove Altieri, we have replaced him with a NYPD OFFICER JOHN DOE WHITE SHIRT WITH HELMET BEARING SHIELD NO. 15519, We have also included a screen shot of this John Doe in paragraph 20. See attached and let us know if we are in agreement on this Proposed 2nd Amended Complaint.

Speak soon,

Wylie

From: Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>
Sent: Friday, October 7, 2022 4:30 PM
To: Siddiqi, Omar (Law) <osiddiqi@law.nyc.gov>; Wylie Stecklow <wylie@wylielaw.com>; mickeyo@lawyer.com <mickeyo@lawyer.com>; Balin, Robert <robertbalin@dwt.com>; Balin, Robert <robertbalin@dwt.com>; Riordan, Shannon (LAW) <sriordan@law.nyc.gov>
Subject: RE: [EXTERNAL] Gray proposed 2nd Amended Pleading

Wylie,

We have no objections to your amended complaint, with the exception of Det. Robert Altieri remaining a defendant. As previously indicated, he has no personal involvement as was RDO on the date of incident. His activity log for May 30, 2020 is attached here for your convenience.

Sincerely,

Nadine Ibrahim
Senior Counsel
Special Federal Litigation Division
The City of New York, Law Department
100 Church Street, 3-187
New York, NY 10007
(212) 356-5037
nibrahim@law.nyc.gov

From: Siddiqi, Omar (Law) <osiddiqi@law.nyc.gov>
Sent: Tuesday, October 4, 2022 3:46 PM
To: wylie <wylie@wylielaw.com>; mickeyo@lawyer.com; Balin, Robert <robertbalin@dwt.com>; Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>; Balin, Robert <robertbalin@dwt.com>; Riordan, Shannon (LAW) <sriordan@law.nyc.gov>
Subject: RE: [EXTERNAL] Gray proposed 2nd Amended Pleading

Dear Wylie

I'm looping Nadine and Shannon into this conversation as they'll provide the further information re: the amended complaint.

Thanks

Omar J. Siddiqi

Senior Counsel

Special Federal Litigation Division

New York City Law Department

Office of the Corporation Counsel

100 Church Street, Room 3-312

New York, New York 10007

(212) 356-2345

osiddiqi@law.nyc.gov

From: Wylie Stecklow <wylie@wylielaw.com>

Sent: Tuesday, October 4, 2022 3:38 PM

To: Siddiqi, Omar (Law) <osiddiqi@law.nyc.gov>; mickeyo@lawyer.com; Balin, Robert <robertbalin@dwt.com>; Balin, Robert <robertbalin@dwt.com>

Subject: Re: [EXTERNAL] Gray proposed 2nd Amended Pleading

Omar

Please confirm that the City can reply to us by Friday with consent to file our amended pleading.

Thanks,

Wylie

From: Wylie Stecklow <wylie@wylielaw.com>

Sent: Wednesday, September 28, 2022 6:35 PM

To: Siddiqi, Omar (Law) <osiddiqi@law.nyc.gov>; Bahrenburg, Richard (Law) <rbahrenb@law.nyc.gov>; mickeyo@lawyer.com <mickeyo@lawyer.com>; Balin, Robert <robertbalin@dwt.com>

Subject: Re: [EXTERNAL] Gray proposed 2nd Amended Pleading

Omar

Thanks for confirming receipt of the proposed 2nd amended pleading. Please also confirm that we will have the City response to journalist terms and the NYPD training materials and Patrol Guides re Journalist right to record by COB tomorrow.

Thanks,

Page 5 of 7

<rbahrenb@law.nyc.gov>; mickeyo@lawyer.com <mickeyo@lawyer.com>

Subject: Journalist term responses

Hey Omar

I am emailing as a gentle reminder that we expect to receive responses from the City to our journalist terms. Even though we thought they would have been provided already, please do your best to send it to us by COB tomorrow. Also, we are awaiting the current training and PG sections regarding a journalist right to record.

We should have the proposed amended pleading in the next few hours or latest tomorrow with a redline pdf for you to review.

Wylie

Wylie Stecklow PLLC

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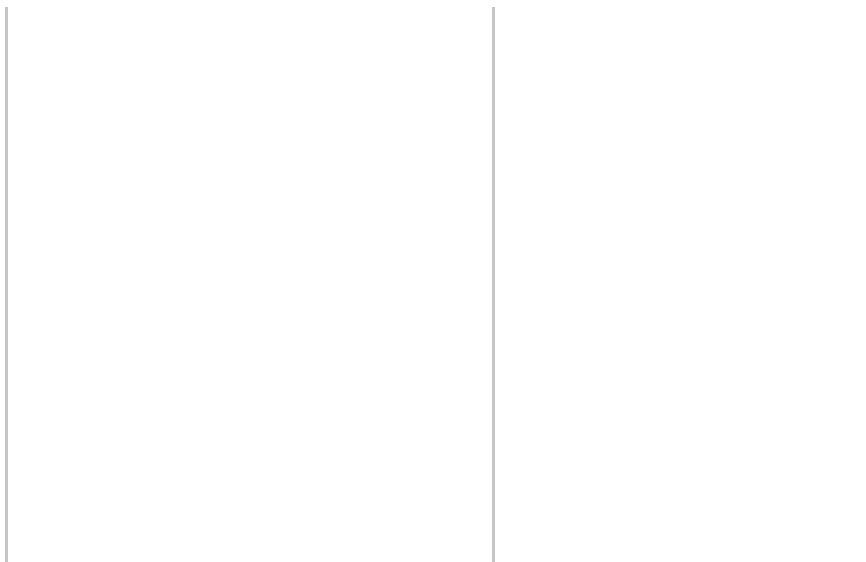
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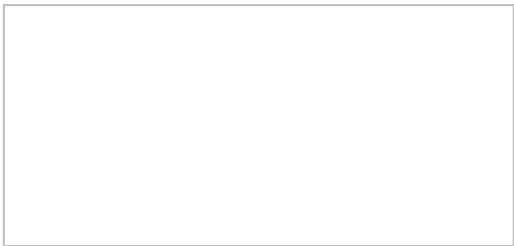
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